

Director:

I respectfully submit that, rather than designate either aquifer a Ground Water Management Area or a Critical Ground Water Area, the Director and Department should exercise their general powers under Idaho Code section 42-237a.g. to take a very active roll in participating with the ALREADY EXISTING cooperative in place, PBAC, and help supervise and control the administration of water rights and the efforts already being undertaken. This option makes the most sense because:

- There is nothing to be gained in the way of practical ability to fashion workable solutions by designating either aquifer
- A designation risks destroying the balanced and cooperative approach being undertaken by PBAC, and thus losing the cooperation of Washington users of our shared aquifer, who are not subject to the Department's authority
- A designation, and resulting imposition of authority and control by the director, risks potentially time-consuming, expensive, and wasteful litigation that would impede progress toward the goal of developing better water management practices for the aquifers
- The scientific data regarding rate of recharge, rate of usage, the hydrogeology of the area, and whether any causal link exists between pumping and the decreasing Grande Ronde water level, IS INCOMPLETE AND NOT FULLY UNDERSTOOD (as demonstrated at the February 2, 2004 public meeting at the College of Law in Moscow, as well as other public discussions and available scientific publications). Further research is currently underway, and at a minimum, the Director should abstain from making a designation until the latest round of research is complete. Meanwhile, the Director could have a very direct and present influence in the ongoing cooperative efforts undertaken by PBAC to minimize risks to the aquifer, while respecting the usage needs of local users. is incomplete, and further research is underway.

Sincerely,

Trapper Stewart  
Grande Ronde and Wanapum water user  
Moscow, Idaho 83843

Dear Director Dreher,

Thank you for taking the time to address the issue of groundwater designation in the Moscow area.

While depletion of precious resources is something we all want to avoid, I believe you have the opportunity to make a wise decision rather than a rushed decision.

I urge you to allow local interest to continue their work on conservation, regional partnership and long term planning. I believe that PBAC has proven themselves and should be allowed to continue their work. I hope you will leave this important issue in the hands of those who have the most at stake. Recent information provided by the City of Moscow indicates that pumpage from the deep aquifer may be stabilizing.

I also believe that designation by your office is not in the best interest of local partnerships or interstate efforts to aquifer federal funding.

Thank you for you time and consideration.

Sincerely,  
Tina Thomason

Greetings IDWR Director,

I have two perspectives to offer. First, as a resident of Moscow, I believe that no action (designation) by the State is required at this time. It appears to me that sufficient measures have been taken to both gain a better understanding of the aquifers and to stabilize the aquifers at this time. It seems to me that we should wait and watch for the next 5-10 years for the efforts of the PBAC to materialize. Positive change is not going to happen overnight. We need to give the PBAC activities a chance to work before jumping into "critical" or "management" designations. The data presented by Dale Ralston, John Bush, Larry Kirkland and company suggests that we are not in jeopardy of running out of water at any foreseeable point in the future. I do believe that the members of PBAC need to continue their conservation, reduction and reuse efforts in earnest because I don't believe in wasting the resource. However, I believe we do not need IDWR to step in with designations at this time.

In addition, as a Moscow resident, I was very concerned about the circumstances surrounding the Naylor Farms application and remain concerned that if the application is approved, it has the potential to erase all positive effects of conservation efforts to date. The negative affect on local morale will be devastating. I for one will resent any requests to reduce or conserve when a such a ludicrous request is granted.

Second, as the District Manager of the Palouse Conservation District (WA), I have witnessed unprecedented cooperation and commitment across state lines by the PBAC members and others to address water related issues. The most recent of which is the WRIA 34-Palouse Watershed Planning effort which the Palouse CD is serving as lead entity. The effort has been underway for two years now and has been well attended by both WA and ID representatives. Phase 1 has been completed in half the time of other watersheds across WA State, and Phase 2 is scheduled for completion December 2004. Phase 3 will be the crafting of the watershed management plan which will contain agreed upon actions for addressing water quantity, water quality and instream flow issues within the watershed. The primary focus of the effort is water quantity, both ground and surface. I am going to assume that you have at least heard of this process if not being very familiar with it so I won't drone on about details of the program itself. The main message I would like you to consider is that there is significant, comprehensive work already being done to address aquifer related concerns. Any additional processes would be a duplication of efforts and only serve to confuse the issue. Give the existing processes a chance to work on the problem first, then return in 5-10 years to see what has been accomplished.

Thank you for the opportunity to comment.

Rob Buchert  
Moscow Resident &  
Palouse Conservation District Manager

Dear IDWR Director:

I am a long-time Moscow resident, and am writing to urge you to approve the Palouse Basin Aquifer Petition now under consideration. I attended the rather lengthy public hearing at the Latah County Courthouse, and spoke at that time in support of the petition, mainly because I strongly feel that when a resource as precious and potentially irreplaceable as water is at stake, the burden of proof must lie with those who would overuse the resource. I listened carefully to all those who spoke, and have reviewed the petitioners' materials, as well as contrary arguments. Having considered both sides, I strongly believe that those opposing the petition have yet to demonstrate that the aquifer is anything close to a sustainable resource at current use/recharge rates. This goes double for any future use above and beyond current levels.

Practically speaking, I am asking you to intervene on behalf of the State of Idaho, since the state reserves ownership over all Idaho water. I know the Moscow development community, and quite frankly, I do not trust them to conserve or wisely manage our water resources if they are left to "locally manage" these resources. It may seem odd to you, but I am sure this is not the first time the state has been asked to intervene in a resource dispute by imposing common sense, and a longer-term view of sustainable use than is likely to emerge locally. To put it simply, there are enough vested interests in this community with access to political power that I fear the public interest will not necessarily be the guiding principle in any local decision making on this issue.

The City of Moscow has effectively ignored this petition for as long as they could, implementing no new conservation measures or even public education on the issue, and the city's water consumption has in fact increased. I would like IDWR to establish a pumpage cap, and impose mandatory conservation measures to enforce this. I would also like to see some kind of local advisory board that includes conservation advocates in sufficient number that they not be steamrolled by city officials, University of Idaho officials, or local business people, builders, and developers.

Fundamentally, there is plenty of evidence to support the assertion that the City of Moscow is and has been engaged in groundwater mining for decades now. This I believe is the crucial issue, and I hope you will decide to intervene and approve the petition before you.

Thank you for serving the people of Idaho, and ensuring that Idaho's water remains a resource for all future generations of Idahoans.

Sincerely,

Dr. Chris Norden  
Moscow ID 83843

Dear Mr. Karl Dreher, Director:

I attended the public informational meeting that was held last night here in Moscow on the above referenced issue. The first part of the presentation by Mr. Dale R. Ralston was a technical review of the hydraulic conditions of the Palouse aquifer. It was very informative. However, the second portion of the presentation did not provide the information I need to make a decision about how I stand on the issue. I have talked with several other people who attended the informational meeting last night and they feel the same way.

The second part of the presentation did not focus on the issue at hand. Rather, it was an overview of water right laws. Most of the presentation didn't seem to be at all relevant to evaluating the petition. The last slide presented had a brief definition of a "Critical Ground Water Area" and "Ground Water Management Area". That was the only part of the water rights law presentation that the audience was interested in. Then the presentation was over. I expected there to be some explanation as to what these designations actually mean for those of us living and using water in the Moscow region. I also expected an explanation as to the impact on growth and development in the region. I expected that some examples (such as the current situation in Rathdrum) and/or hypothetical situations would be described so that the citizens could actually understand what the designations mean to our community. There should also have been some discussion about other options. I could not stay for the question and answer period after the presentation, but I have heard from others who stayed that questions specific to how these designations affected our community went unanswered.

Last night's informational presentation only provided half of the information needed by individuals in the community to make an intelligent decision. The other half of the information, definitions and implications of "Critical Ground Water Area" and "Ground Water Management Area" designations, was not provided. I am requesting that another public informational presentation be made to the general public by Idaho Department of Water Resources as soon as possible. The presentation should focus on providing information about the different designations that is relevant to the current situation here in Moscow. The presentation should be made so that meaningful comments can be provided to you by the citizens by the end of February as you have requested in the notice distributed at last night's meeting.

I appreciate your department's willingness to provide the information and the attempt that was made last night. I also appreciate your willingness to receive comment from the public. Because this issue is extremely important I am hopeful that you can satisfy this request for the benefit of the individuals in the Moscow region community. I will be actively looking for a news release that will advertise another presentation.

Sincerely,

Laura L. Taylor  
Hodge & Associates, Inc.  
Moscow, ID

## Water Conservation in Moscow

I own a home in the city of Moscow and care about the quantity and quality of water for the future of our community. Community water consumption has been over the set limit for the past 5 years. Mining water will eventually lead to major environmental and economic problems. As mining towns in Idaho become ghost towns when the resource was depleted, Moscow could follow the same path. Sustainable water use needs to be the goal.

Conservation of the Grand Ronde (GR) aquifer is wise for the future of the Palouse. The high value water quality of the GR aquifer should not be wasted on low priority uses such as irrigating exotic plants found in lawns. Incentives to conserve water could be achieved through a free market system of tiered water rates. People who use more water should pay more for the water per unit. This solution for conservation will generate additional money for further studies and possible alternative solutions and will decrease consumption if water demand curves are normal.

I support a critical management area for the GR and Wanapum aquifers in order to give the city help towards sustainable water use in the future. I support tiered water rates before the summer of 2004. I support ensuring sustainable water use over increased development in the Moscow area. I support a moratorium be placed on water rights applications for both aquifers in the Moscow/Pullman region until a sound plan is in place to stop ground water mining. I have taken this position because the local groups including government working on this issue for 33 years have not been able to resolve the drop in the Grand Ronde Aquifer. With continued growth in the Palouse area, the demand for quality water is likely to increase if no controls are in place. My reason for including the Wanapum Aquifer is because water use will likely shift from the GR Aquifer. A complete look at all the ground water resources is more appropriate.

Thank you for the opportunity to comment.

Larry McLaud  
Moscow, ID

Director,

I do not favor ground water management or critical ground water management designations for Moscow's aquifers for the following reasons.

1)Evidence shows that the aquifers are a shared resource with the state of Washington. The majority of water taken from the aquifers are drawn in the state of Washington and sever water restrictions in Idaho will not have much effect on the ground water levels shared by the two states.

2)There are signs that stabilized pumping in the region is reducing the drop in the levels of the water tables. This needs more time to work.

3)New water conservation programs in Washington are due to be put in place next year will substantially reduce the withdraw of ground water that is shared with Idaho.

4)Current water conservation programs in Moscow are working to reduce water consumption. I think local management of this resource is working and will solve the problem if given the chance.

Karl Johnson  
Moscow

I'd like to supply my comments regarding the designation status of Moscow groundwater. I would like to see the state handle the water situation here in the Moscow area. I plan to stay in this area for my lifetime and believe that the city council has put business and development interests over all others.

Charles Burke  
Moscow, ID

If the water level is going down so fast, why do you let U of I pump so much water for the fish research? I don't know much about their usage, but I do remember your office approving their consumption. I have not heard anything on this use being anything to do with the lowering of the aquifer.

Doug Gadwa  
Moscow, ID 83843

Dear Director Dreher:

It is my opinion that the City of Moscow is unable to manage its water resources properly and thus, I support the petition to make the Wanapum and Grande Ronde aquifers ground water management areas.

Here is evidence I believe is incontrovertible:

The City continues to build new residences, both high and low density, in unprecedented numbers. For the most part, these will be large drains on the aquifers, replacing non-irrigated farmland which uses much less water.

There are no mandates on developers to force them to provide low or no water landscaping, therefore, many of these homes and apartments will require high levels of irrigation. There is not even an effort by developers to educate new residents about prudent water usage.

The city government has been studying the water usage issue for approximately 12 years. In that time, the water table continues to drop, but there is no effort being made to take action in the form of conservation measures or rate adjustments.

Now, although I do not really want higher water bills, I believe that I'd rather have Moscow citizenry conserve the excellent groundwater we have now, pay a bit more for the water we use, AND conserve water to keep our bills down. The alternative is that someday the city will, faced with a water shortage, will have to do something drastic and costly, like building some a reservoir, saddling taxpayers with a huge bill for water of substantially lower quality. I believe it is better to live within our water budget starting now.

One last thing. I am willing to have higher water rates ONLY if BUSINESS also has ITS rates raised. So often, we smaller users end up footing a bill and business ends up using vast amounts of water, at bargain rates, not bothering to conserve. Please don't let that happen.

I really think the city needs to reconsider its development strategies, because at the rate we're going, the aquifer will not survive.

Thank you for taking my comments.

Cynthia Nichols  
Moscow, ID



Dear Director Dreher,

I am writing in support of the petition to make the Wanapum and Grande Ronde aquifers ground water management areas.

Left to its own devices, the City of Moscow will continue to study the problem of the declining levels of the Grande Ronde aquifer, while it approves massive new residential and commercial development. The best evidence of this statement is the recent approval and recommendation to the City Council by the Community Planning and Development Department of the annexation and development of a 93 acre residential and commercial tract on Moscow's east side. This is in addition to the ongoing development of 26 homes east of Mt. View Avenue, and the development of a large residential tract on Moscow's north side. Development of high density residential continues adjacent to A street, on Moscow's northwest side. In fact over 200 new residential units were approved or are under construction at this time. All of this, when the city admits that it is concerned about the decline in the aquifers.

For many years the city government has been in the thrall of real estate and development interests. Both Moscow Building Supply and J&J Building Supply completed expansion into new facilities in 2003, in order to better serve the rapidly growing development industry.

It has been my personal experience that the city has not moved to limit the pace of new construction while it makes only token efforts to encourage conservation in newly constructed plumbing systems (low flow devices, etc.). When I purchased a new home in Moscow in April 2002, I was from outside the area and unaware of the water crisis in Moscow. The real estate agent gave no hint of the problem. When I hired a local landscape contractor there was no discussion of low water use landscaping, and being ignorant, I installed lawns and sprinklers. Although the water problem was known then, I had no idea it existed. It would have been nice had I had the opportunity to plan my landscaping for low water use.

I believe that the management of Moscow's water resources by the IDWR will provide more intelligent use of the resource not the development based bias of local officials.

Sincerely,

Bill Bonte  
Moscow, ID

Dear Mr. Dreher,

Thank you for taking the time to address this issue and hear our concerns. You are in a difficult situation...no matter what you decide, you will hear complaints. Please accept the following comments in opposition to the request for designation you received last fall from citizens that are concerned about water use and growth in Moscow.

I do not support any designation at this time, but would rather work toward a solution at the local level. I believe the entities that make up the Palouse Basin Aquifer Committee are best suited to lead this effort. As you know, the largest water users in the area are members, and the organization is recognized for its expertise and generally operates with the confidence of the local communities. Mr. Les McDonald, Public Works Director for the City of Moscow recently provided the public with information that seemed to indicate that deep aquifer use is stabilizing, which is encouraging. At this writing it seems somewhat likely that Washington legislators may have money available to fund a WSU water reuse project in Pullman similar to the successful model implemented by the U of I and City of Moscow. If this develops as planned, it will further stabilize water consumption. These creative efforts have been influenced by PBAC and I feel confident the partnership will continue to deliver better regional solutions to our water problems if given the opportunity to continue local control. I have heard testimony from hydrologists that suggested that at some point we may need to rely on surface retention and injection to augment our aquifers. It's my thought that our ability to access such funds will be expedited by a regional, bi-state partnership.

Thank you for this opportunity to share my thoughts.

Mike Thomason

Dear Director Dreher:

Please accept the following as my comments on the petition to designate those portions underlying the Moscow sub-basin of the Grande Ronde aquifer as a Critical Ground Water Management Area and the Wanapum aquifer as a Ground Water Management Area.

I strongly support the petitioners' requests.

The City of Moscow and the University of Idaho draw their water from both the deep (Grande Ronde) aquifer and the shallow (Wanapum aquifer). Historically, this has not always been the case. Until 1960, the City and UI (the "entities") derived all their water from the shallow aquifer. It was only when it became apparent from precipitously declining levels in their shallow wells that the entities drilled into the deep aquifer. The difference in water quality was so significant between the two aquifers (the shallow aquifer carries a significant level of minerals in a dissolved form) that the entities ceased pumping from the shallow aquifer entirely.

Or, rather, they ceased until 1990 when it became apparent that the anticipated recharge of the deep aquifer was in fact not occurring and increasing their draw from the deep aquifer would accelerate the already steady and unremitting decline therein. In 1990, the City once again started pumping from the shallow aquifer. Pumpage from the City's deep wells was essentially stabilized with the balance of the water needed to meet the city's continuing increasing demand made up from the shallow aquifer (see attached file). Dr. Ralston estimates that shallow aquifer water now makes up 30% of the City's water supply.

Attached is a graph of well levels in the shallow aquifer compiled by Dr. Dale Ralston and presented to the public at the IDWR meeting in Moscow on February 2, 2004. As is clearly evident, well levels in the shallow aquifer are not only declining, they are following almost the same rate of decline as was recorded fifty years earlier. At the point at which the City brought the deep aquifer wells on-line, the shallow wells were in essential free fall. Comparison of population statistics for the period 1940-1960 and 1990 to date show approximately the same population trends (see attached file).

The conclusion that should be drawn from the data is clear: Moscow will run out of available water in 20 years (at the latest) if the historic population growth trends continue. It is acknowledged and evidenced that the deep Grande Ronde aquifer is being mined making it both an unlikely and illegal place to seek additional water. The shallow Wanapum aquifer is a finite resource that has been limit tested in the past in a very real way. Knowledge of the shallow aquifer capacity is not hypothetical.

Yet despite the obvious indications of the data, the City of Moscow continues to address its water crisis with lip service only. Just two days ago, the City agreed to annex 93 acres for the purpose of developing additional residential housing. The developer has proposed a plat that would add approximately 565 new living units. At an expected average occupancy of three people per unit and water consumption based on the current city per capita rate of 120 gpd the City will be increasing its water needs by 8-10% from this one development alone.

Or looked at another way, when this development and other developments already approved are fully built out, the City will have increased its population to the numbers coinciding with the end of shallow aquifer water availability.

In 1967 the City recognized the problem at hand. Thirty-seven years later, no City water conservation plans or ordinances exist. (See petitioner's accompanying documents)

In 1987 IDWR strongly suggested that without real action by the entities, IDWR intervention would be required to halt ground water mining. Seventeen years later, water levels in both aquifers are declining while annual pumping by the City has risen to an all-time high.

In another twenty years - at the latest -, we'll be out of water. IDWR must approve the petition and begin immediate regulation of pumping volumes in the City and UI wells.

Sincerely,

Mark Solomon  
Moscow, Idaho

Please consider the following:

The local powers-that-be have not been able to come up with the will to implement any real solutions to our decreasing water supply. They only point at PBAC, an entity without power, as the driver for these solutions. Then they wish to study the problem to death: not a bad idea as it will eventually go away.

PBAC continues to suggest that somewhere in the mist of the future we will find some high tech engineering solution to the problem; such as pumping treated effluent or surface water into the aquifer. These are not reasonable suggestions for at least two reasons; the law states that pumpage can not exceed NATURAL recharge, the cost to perfect and implement these ideas is ridiculously prohibitive.

I would recommend that the state declare the aquifers as CGWMA and GWMA, and stop any further increase in pumpage (maybe a reduction).

Thank you for your time and consideration in these matters.

Gustaf

We feel that local bureaucrats and politicians have not given serious consideration to our declining aquifer. We could use some state help.

John and Sara Holup  
Moscow, Id

Dear Director,

If you need one good reason to declare the Moscow area a CGWA then look at the new development proposed to the Moscow City Council last night (2/18). Almost 600 new dwellings are on the plat and 5 acres of commercial rezoning. THIRTY MORE ACRES are to be brought before the Council at a later date for this same Salisbury development.

This area is not taking ground water serious. This should be considered a slap in the face to IDWR since they are even trying to get this approval on the books before your ruling.

Please establish a Critical Ground Water Management Area on the Palouse. Give us a chance to control our growth in a smart way.

Steve Streets  
Moscow, ID

Dear Director Dreher:

Thank you for this opportunity to comment on potential Groundwater Management Area and Critical Groundwater Management Area designation in the Palouse Basin.

I am submitting comments that I had prepared for the February 2, 2004 meeting hosted by IDWR in Moscow, Idaho. I was disappointed to learn at that meeting that public testimony would not be heard. It was our understanding that this would be an informal hearing where issues relevant to our unique situation in the Palouse Basin would be discussed. It was reported in the paper that 200 people were in attendance. The presentation put together by IDWR staff fell short of our expectations.

Public awareness and participation in this issue is high. Thank you for carefully considering the citizen's petition, available science, political framework, and public support for conservation and long-term planning for groundwater management in the Palouse Basin.

In addition to my February 2, 2004 comments, I have included below my comments from the December 15, 2003 City Council meeting on this issue.

Sincerely,

Kelley Racicot

\* \* \*

February 2, 2004

Dear Director Dreher:

My name is Kelley Racicot . I am a board member of the Friends of the Clearwater of Moscow, a coalition partner and co-petitioner.

Throughout this process there has been a lot of talk about local control and a lot of misunderstanding about what that means in the context of managing our drinking water. We are not asking the State to take control of our water. We are asking the State to take responsibility.

The waters of the Grande Ronde aquifer, the Wanapum aquifer and all other waters are owned by the state of Idaho in trust for the public. IDWR is the trustee. We are asking the State to provide a framework within which we can work together, locally, to solve the problem of increased pumping and declining water levels due to water mining. IDWR is the only entity that has the legal authority to regulate use and to deal with the bi-state nature of our problem.

Voluntary efforts to solve the problem without such a framework have failed. PBAC is a valuable research entity, but lacks the authority to oversee the implementation of long-term

voluntary measures. As such, voluntary measures are subject to short-term political perturbations.

This past year is a perfect example. In June of 2003, our coalition of concerned citizens approached both the City of Moscow and the UofI--the two users of Grande Ronde water-- with a proposal. We had drafted a petition to IDWR asking for designation, but were willing to hold the petition if the City and UofI would take measurable steps towards implementing conservation measures--measures that have been discussed for many years--and dedicate time and funding to develop long-term conservation plans. The City of Moscow agreed to work with us and implemented some voluntary conservation measures during the summer 2003 watering season. The City also agreed to regular reporting periods and to put the coalition on the agenda in September to review the success or failure of these measures.

In September we requested a place on the agenda as agreed, but our meeting was pushed back. Pushed back repeatedly it turns out. During this time we discovered that the City of Moscow had changed its course and participated with PBAC representatives in a meeting in Boise to discuss Groundwater Management Area designation. Mayor Comstock wrote to Director Dreher saying, "At this time I believe that designation of a groundwater management area pursuant to Idaho Code 42-233b may be in the best interest of our community and our resources. . ."

In a PBAC handout titled, Summary of Visit with Karl Dreher, Director of IDWR, in Boise, Oct. 20, 2003 the following was reported:

Karl Dreher is aware that by Idaho statute, ground water is being mined and has been mined for many years in the deep aquifer in the Palouse Basin.

At the end of the conference call it sounded like the tentative plan is for the City of Moscow to request being put into a GWMA to avoid the possibility of being mandated into a CGWMA as a possible suit against IDWR to enforce state law on designation of CGWMAs.

By December 22, 2003 the City had changed direction a third time. The City Council voted unanimously to recommend, in a letter to IDWR, that the Director of IDWR forebear taking any action at this time.

We had a similar experience working with the UofI. Positive discussions did not move forward due to personnel changes in the administration and shifting priorities.

I bring up the political realities of citizen involvement, because it is the lack of a management framework--not the people involved--that makes progress difficult. We believe a designation, as it is outlined in our petition, will provide the framework within which all entities--citizens, the City, PBAC, and the County--can work together locally to turn it around. And by doing so, the public interest will be served beyond the next election, legislative session, or change in administration.

Thank you for your careful consideration of our petition. I know you and your staff are spending a lot of time and energy on this. I have included my public statement to the City of Moscow,

given on December 15, 2003, attached to the written version of my testimony tonight. Thanks again.

Sincerely,

Kelley Racicot  
Board of Directors  
Friends of the Clearwater  
PO Box 9241  
Moscow, ID 83843  
(509) 334-6824

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### **Testimony, Moscow City Council meeting December 15, 2003**

My name is Kelley Racicot and I am a member of the Board of Directors of Friends of the Clearwater.

This weekend I was thinking about what I might add to the written comments I submitted to you last week and I picked up Marc Reisner's classic text, Cadillac Desert and re-read the story of the Ogallala aquifer.

The Ogallala aquifer stretches from South Dakota to West Texas. It is both the largest discrete aquifer in the world, and the fastest-disappearing aquifer in the world. The former Dust Bowl states started pumping in earnest in the 1960's, and by 1975, the rate of withdrawal over natural replenishment was roughly equivalent to the flow of the Colorado river. They have sucked it dry. Although we don't have irrigated agriculture here, the primary use for Ogallala water, we have similar choices. Using Reisner's analogy, if surface water can be compared with interest income, and non-renewable groundwater with capital, most of the west relies on interest income. However, like the High Plains states, the Palouse is devouring capital.

When I read about the Ogallala, where the driving use of groundwater is industrial agriculture, I realize how lucky we are in terms of opportunity. 80% of our water is for residential use, and most of that is used to water Kentucky Bluegrass lawns. The gear ratio of conservation is in our favor. If we were to reduce our per capita daily consumption from 130 Gallons per day per person to 100, we would save as much water as the total used for all business, commercial, and industrial interests.

In the Palouse Basin, where there is a finite groundwater supply and no water industry, conservation is good for business. In the context of a moratorium, the same is true. Will our community be attractive to business if we have unregulated development that ultimately relies on large, expensive public works projects to replace our depleted water supply? If potential businesses ask, when can we tell them that bill will come due? What happens instead if we allow for growth within the natural limits of our water supply? We avoid the bust.



The moratorium is one tool that Mr. Dreher can use to temporarily define the limits of our water supply and provide a framework within which we can implement a conservation program that works. In the spirit of the holidays I will use a Charles Dickens analogy: We have seen the ghost of the future in the disappearing Ogallala aquifer, we have the humbling experience of 37 years of failed efforts to stop the mining of our aquifer—the ghost of the past—what we need now is the political will to work in the present for a better future.

**The following was submitted on December 10, 2003, as written testimony for the Moscow City Council meeting December 15, 2003.**

The Palouse Basin is blessed with a source of high-quality drinking water, thousands of years old and free of chemical and particulate contamination that trouble agricultural communities throughout the west. Our Grand Ronde aquifer is declining 1-2 feet per year and we are here, ostensibly, to discuss what actions are in the long-term public interest of our communities with regard to 1) stopping the mining of the aquifer and 2) actions that will provide for a sustainable supply of clean water for future generations.

The term “public interest” is one that I haven’t heard from this City Council formally, or from informal conversations or emails that have been flying around lately. I have heard plenty about the concerns of special interests—What about unlimited development?—and excuses about why our elected officials are unwilling to demonstrate leadership on this issue—What about Pullman and Washington State? What about the unknown science?

The reality is that there are ghost communities throughout the west whose epitaph reads: too little, too late. What we have here is an opportunity. We have an opportunity to move forward with humility in light of well-intentioned, but failed efforts to reverse the trend. We have an opportunity to provide leadership throughout the region—to lead by example—instead of worrying about what folks across the state line might be able to get away with.

Washington has complementary laws and is aware of the declining aquifer, as is Karl Dreher. A goal of this process should be a binding bi-state pact that will stop the mining of our aquifer and is a blueprint for sustainable growth throughout the region. Of course this won’t be easy, everyone knows that bi-state issues are especially challenging, but the alternative is each side racing to use as much as they can get away with, and that is a race no one wins.

In response to the City of Moscow and PBAC representatives initiating discussions with the Idaho Department of Water Resources regarding some sort of designation, our coalition of concerned citizens filed a petition that asks Mr. Dreher to consider all of the options provided by law, a failure of the City and PBAC so far.

Our petition has been mischaracterized by Mr. Kimberling and others. Our coalition has repeatedly stated that we support sustainable development in the basin. The requested Critical Groundwater Management designation for the Grand Ronde aquifer asks for a moratorium in order that a plan be developed and implemented in which conservation measures allow for development within the natural limit of our water supply. We also ask that the Wanapum and all

surrounding recharge areas be designated a Groundwater Management Area because, in part, this will provide users within the Palouse Basin in the County protection. Neither of these designations will affect domestic water rights. Just as our elected officials are expected to balance budgets, we can expect no less for our children's future water supply. Limitless development for short-term gain in the face of a declining aquifer is, frankly, barbaric. We have the opportunity to plan for development that adds value to our community—let's work together to do it.

Our basin is one of the most studied in the State of Idaho and we will supply Karl Dreher with science, data, public records, and all relevant supplemental information for his consideration. Underneath the voluminous data and analysis, there is a bottom line. Karl Dreher has said on multiple occasions that the Palouse Basin is mining its aquifer and the efforts thus far haven't worked.

Where is our water going? Most of our City water is used to water Kentucky Bluegrass, often during the heat of the summer day. We have Universities using water from both aquifers to simulate trout streams in their basements. Our public buildings and residences still use mega-flush toilets. The ways in which we pour our drinking water down the drain—and it's gone forever—is astounding. Based on a national average, our per capita consumption in Moscow and Pullman doesn't look so bad. But if you look at communities with similar climates and with similar populations we use twice what we need to. The City Council has adopted the philosophy that all use is good use, and we've got to stay ahead of the competition. From my engineer's perspective, this is not a problem of needing more data, but the political will to make positive change.

Conservation was such a low priority that for years the City didn't even investigate why 30-50% of the water pumped was unaccounted for—it turns out the meters are all messed up—let alone put money, brain power, or time into real solutions. Conservation measures are known, proven to work, and in most cases simple to implement. And Citizens have been asking. In fact, two recent polls of Moscow residents show that a majority think the City should be doing more for conservation. What's missing? The philosophy that underpins current policy is misguided. We must discuss what kind of use, not no use. We must discuss what kind of development, not whether we develop or not. We must discuss the costs of use as well as the benefits we enjoy.

On behalf of the Board of Directors of Friends of the Clearwater, our membership, and concerned citizens, I urge the Mayor, Council, and County representatives to request that Mr. Dreher consider all of the alternatives provided by law in order that the public interest is served—Critical Groundwater Management Area, Groundwater Management Area, and both. Don't underestimate public support for conservation. Those of us who support conservation also support sustainable development. The science exists. What we need now is political leadership. Our future depends on it.

Sincerely,

Kelley Racicot  
Board of Directors, Friends of the Clearwater , Moscow, ID

Please accept the following as an addendum to my previously submitted comments.

Having reviewed comments submitted by several governmental entities regarding the petition, there is a common reference to the supposed "stabilization trend in the Grande Ronde aquifer." Let's examine that claim.

It is primarily (if not solely) based on information compiled and presented by Dale Ralston to PBAC and the public at the 2/2 public meeting held by IDWR. One example is the attached hydrograph of the WSU test well which appears to indicate a change in the trend curve that could be interpreted as stabilization beginning to occur. Similar information was not presented for the DOE test well which is likely to be a clearer indicator of conditions in the Moscow area due to its relative geographic proximity.

However, if we optimistically take the WSU well information as representative of overall conditions then hydrograph depths appear to be levelling off. The question that must be answered is why.

Ignoring the error in the x axis labelling, it appears the portion of the graph indicating a stabilization trend extends for about the past ten years. It is likely not coincidence that this period roughly coincides with the City of Moscow's resumption of pumping from the Wanapum aquifer thus stabilizing the City's demand of the Grande Ronde.

This is good news and bad news. The good news would be that capping pumping levels appears to have a positive effect on hydrograph levels in one test well. The bad news is that expanding pumping from the Wanapum by the City of Moscow has a known development potential and it is of a very short time frame given the City's development and population trends (see my comments submitted previously). Once that potential is fully utilized, increased withdrawals from the Grande Ronde will resume and the hydrograph levels will resume their steady march to the bottom of the well.

In sum, IDWR must act in support of the petition.

Sincerely,

Mark Solomon  
Moscow, ID 83843

Mr. Karl Dreher  
Idaho Department of Water Resources  
1301 N. Orchard Street  
Boise, ID 83706

SUBJECT: Grand Ronde Aquifer

Good Day,

I am apposed to the Grand Ronde Aquifer being declared a Critical Ground Water Area. I am also apposed to having the Wamapum Aquifer be declared a Groundwater Management Area.

I am a 57 year resident of Moscow and a local business owner.

I have attended the two Moscow City Council meetings when this subject was aired in a public meeting format. I also attended the meeting at the University Of Idaho Law Library on 2 February 2004. I feel that over 60% of the Grand Ronda Aquifer lies west of the Idaho/Washington boarder. The consumption of this water can not be solely controlled by the State of Idaho and yet the businesses and people in and around Moscow will suffer for a situation they have little control over.

I do NOT support the approval of another large water user like Naylor Farms.

I do support a conservation effort. I support combined water saving effort by ALL users of both aquifers - on both sides of the Idaho/Washington boarder.

Thank you for this opportunity to offer my comments.

Sincerely, Timothy W. Brown  
Moscow, Idaho 83843

Please count my wife and I as among those that support the IDWQ (sic) taking control of the aquifers supplying Moscow and the surrounding areas with water.

We live about 1 1/2 miles north of Naylor Farms whose application was one of the events which has led to current citizen concern about water management.

I have lived in and around Moscow three separate times -- four years as an undergrad at UI, three years as a graduate student, and after a considerable absence, the last fourteen years. Moscow city government has in my opinion always been driven by developers and certain businesses. Witness the number of subdivisions which were originally okayed without

sidewalks, curbs and gutters, and paved streets. I know how this happened because of a business relationship I had for awhile with a long-time Moscow developer.

My point is that because of long time city personnel, tradition, real estate sales agencies, and other factors, even a reformist city council would have a very difficult time immediately erasing the overly pro-development stance of the city which drives policy and enforcement.

As further evidence, I offer the "voluntary" conservation measures taken by the last city council. I do not feel they worked. Moscow is now working on an ordinance. The main drafters are those at the heart of the philosophy of the Moscow old guard pro-developers and business favorers. I suspect but cannot say for sure (because the city has not allowed access to the working draft of the ordinance) that numerous loopholes will be present for favored groups. Even if a satisfactory ordinance is passed, I believe that enforcement will be uneven and will favor certain people like the enforcement of building codes does today.

Therefore, I am in favor of the IDWQ taking control of the management of the aquifer.

Wayne Fox

Mr. Karl Dreher, Director  
Idaho Department of Water Resources  
1301 North Orchard Street  
Boise, ID 83706

RE: Palouse Basin Aquifer Goundwater Management

Dear Mr. Dreher:

This is a follow-up of our letter to Idaho Department of Water Resources dated January 20, 2004. Thank you and Idaho Department of Water Resources for setting up the information meeting held on February 2, 2004 with Dale Ralston and Bob Haynes at the University of Idaho in Moscow.

After evaluating some of the information that was delivered by Mr. Ralston, the Latah County Commissioners have officially gone on record requesting no action by IDWR until the WRIA study being conducted by the state of Washington for the Palouse drainage in Idaho and Washington is completed. In working toward stabilizing water levels in the Grand Rhonde Aquifer we need to find additional water sources. Identifying these water sources in Idaho is part of the focus of the WRIA study. If we are to attain our goal in stabilizing the Grand Aquifer, we need to document available surface water in the Palouse Basin.

We have accepted the responsibility of assuring our local communities have a long-term water use plan. Latah County is willing to assist and support the process of establishing conservation proposals for water use and management being considered by the city of Moscow. Additionally,

we are also working closely with Palouse Basin Aquifer Committee (PBAC) as well as setting up a county water committee to assure all of Latah County is represented in all water issues. We realize this is a very difficult decision; however we again ask that you give us the opportunity to make our local programs, committees, and municipal efforts work in our local best interest before taking final action on the "Critical Ground Water Management Area" designation request.

Respectfully submitted,

Tom S. Stroschein  
Representing the Board of County Commissioners  
Latah County, Idaho

Dear Mr. Dreher:

Your office responded to my previous e-mail requesting more information. More information has also been added to your website that directly responds to my question about what the designations would actually mean to the Moscow region. Thank you - the web site has been very helpful in formulating an educated response.

The groups submitting the petition have provided a beneficial service to the region by giving the community a "wake-up call" about a potential problem that faces the region in the long-term. I am sympathetic to many issues these organizations address and have attended water conservation and landscaping workshops put on by the groups. I greatly appreciate the education they are providing to the community. However, I do not agree that the Grande Ronde aquifer should be designated a Critical Ground Water Area or that the shallower aquifers should be designated a Ground Water Management Area.

I concur with the contents of the letter to you from Moscow Mayor Comstock, especially the first paragraph of page 5 regarding the existing Palouse Basin Aquifer Committee (PBAC) Ground Water Management Plan. I found the portion of the letter related to the procedural problems that designation may create for IDWR alarming.

In addition to the points described in the Moscow Mayor's letter, please consider these other items:

Interstate/Interagency Cooperation is Vital

PBAC is an important and viable organization well-qualified to guide the two-state region in water management. Contrary to the opinions expressed in the petition, it appears PBAC's 1992 Management Plan is having a positive impact on aquifer stabilization and is influencing conservation efforts across state lines. I am basing this opinion on the information provided by

Dale Ralston at the IDWR presentation made on February 2, 2004 where he illustrated that it appears the aquifer level may be in the beginning stages of stabilizing.

The vast majority of the Grande Ronde aquifer appears to be in Washington State with the Moscow area having access to a relatively small portion protruding out of the far eastern edge. No matter what the State of Idaho declares, the users of the aquifer on the Washington State side appear to have far more influence on the aquifer than Idaho users.

Water conservation does not seem to be a contentious public issue in Pullman, Palouse and Colfax (all using the Grande Ronde aquifer) at this time. However, progress is being made towards increased conservation on the Washington side mainly through governmental agencies. Washington State University is anticipating funds to implement a reclaimed water system for irrigation. This will be a major conservation effort which should yield a significant reduction in pumping.

Other projects currently underway that will assist in conservation is the conversion of some university athletic sport fields to "artificial turf" which does not require irrigation. Both University of Idaho and Washington State University have or are installing these type of fields. I hope this trend will continue since irrigated turf fields are intense consumers of water.

#### Development and Economic Growth

Designation of the aquifers on the Idaho side may actually be more detrimental to the aquifer level. Growth in the two-state region will continue regardless of the IDWR designation. After designation developers may prefer or be forced to build on the Washington side. Idaho will be less able to influence water usage out of the aquifers and conservation of the water. As a result of designation the same amount of units will be built but more water per unit may be drawn out of the aquifer because the public on the Washington side does not seem as concerned about water conservation.

Does the State of Idaho really want to encourage inevitable development to occur on the Washington side of the region and miss out on the potential economic growth and tax revenue? What would be the effects of the lost potential economic growth and tax revenue to Moscow and Latah County?

#### Natural Resource

As presented by Dale Ralston at the IDWR presentation it appears the aquifer level is starting to stabilize. This may indicate that the users of the Grande Ronde aquifer are not "mining" water and that the aquifer is recharging. Mr. Ralston readily admitted it is time to create a new model and perhaps reduce recharge assumptions in the next model. I do not think a new model will illustrate that our region is in a water crisis because the aquifer level appears to be stabilizing. The new model is needed to better estimate available water. PBAC's 1999 program to conduct more research and stabilize the aquifer levels by 2020 should be supported in every way possible.

As put forth by Potlatch Mayor Dave Brown in his letter found on your web site, the region is water rich compared to other counties in Idaho. There are other options for water supply that

should be explored and perhaps implemented before declaring this region in a critical situation. PBAC would be the most likely organization to explore these other alternatives.

### Summary

In conclusion I do not think the Palouse Basin aquifers should be designated at this time for the following reasons:

- 1) my concurrence with the information provided to you in the letter from Moscow Mayor Marshall Comstock
- 2) positive and continuing influence of the local management organization PBAC
- 3) increased awareness of the public and governmental agencies about the need to conserve (partially a result of the submitted petition and stepped up efforts to educate the public about the need to conserve)
- 4) the potentially negative effect the designation will have on pushing inevitable development to the Washington side of the aquifer where Idaho citizens will have less ability to encourage and enforce water conservation
- 5) the scientific facts as presented by Dale Ralston do not confirm the petition's assertion that the aquifer is being mined
- 6) there are probably other potential water supply sources that have not been identified or implemented yet

Thank you for your consideration.

Laura L. Taylor  
Hodge & Associates, Inc.  
Moscow, ID 83843

Dear Director Dreher:

As a long time Moscow business owner, I urge you to declare the Grande Ronde aquifer a Critical Groundwater Area and the Wanapum aquifer a Groundwater Management Area in the Palouse Basin area.

Why?

Because I have spent the last 16 years investing considerable time, energy and money developing and building my business (and my home) and do not want my investment devalued by an area water shortage a few years into the future. Ultimately, a business or a home is only worth what a buyer would be willing to pay for it. Nobody will buy property in an area where resources, especially water, are poorly managed, in short supply, or in crisis.



Additionally, over the past four years, my spouse and I have spent thousands of hours reading, researching, attending workshops and countless meetings, participating on city commissions, writing letters and proposals, speaking before the council and numerous other groups, and working through the proper LOCAL channels to assist our communities in adopting workable water efficiency and planning measures.

These efforts appear to continually fall on deaf ears. I am dumbfounded when the Palouse Basin Aquifer Committee's Larry Kirkland suggests that "energy" from members of "coalition" groups has not been "directed toward improving existing water management planning."

Perhaps Mr. Kirkland and other local officials fear outside scrutiny (IDWR) because they know our house (PBAC/Moscow/UI) is not in order.

Local officials have already had over 30 years to achieve a long-term effective water conservation and supply plan and to implement local funding mechanisms to avoid reliance on mostly non-existent "outside (state and federal) funding." Had these officials, working through PBAC beginning in 1987, implemented REAL solutions to our problem, the communities of the Palouse could today be reaping the benefits of a cost-effective, stable, long-term water supply.

Instead, local leaders have lacked political will to implement constructive measures and have been too easily influenced by the "growth at any cost" crowd. Growth can be positive when it occurs hand-in-hand with long-range planning. Unbridled growth is something cancer does. Humans must be more thoughtful.

As you know, natural resource decisions cannot be made based solely on which way the political wind may be blowing on a given day. Likely, this is why IDWR exists and why our water resources are the property of the State rather than local governments.

PBAC admits its focus is on aquifer storage and recovery to the exclusion of conservation even though conservation is a cornerstone of water management programs nationwide.

PBAC's "Annual Report" is due in April each year for the previous calendar year. Yet, a 2002 report does not exist and there is no 2003 report in the works.

Moscow's non-compliance with PBAC's 1992 Groundwater Management Plan for eight years receives no challenge from the other entities. Perhaps it is because PBAC's voting members are all bureaucrats or elected officials who do not want to challenge each other-in essence require themselves to work harder. There are no citizen or resource-advocate voting members of PBAC to provide balance.

The "coalition" understands conservation to be a strong starting point rather than an entire solution to our problem and it allows for time to plan alternatives. Engineered solutions to water supply problems have implementation costs of 10 to 50 times conservation, making conservation very economically viable.

However, the Moscow City Council has not understood this. In June 2003, after discussions with the coalition of citizens groups that eventually presented you with the petition, our unenlightened City Council could only muster a voluntary "please don't water outdoors between 9 a.m. and 6 p.m." suggestion to the public. The result: higher than ever pumping in 2003. This same council voted in December 2003 to "memorialize" their interest in local water management by sending you a letter asking for "no designation" for our aquifers. This, after completely ignoring the fact that their inaction, behind the scenes conference calls with IDWR, and lack of response to scheduling a previously and repeatedly asked-for meeting with coalition members forced the hand of the coalition into filing the petition.

Our "new" Council voted last week to annex 84 additional acres into the city paving the way for development of 565 dwelling units. Moscow averages 2.3 persons/unit and 134 gallons of water per capita per day-a potential increase of 64 million gallons per day or 8 to 10 percent per year. Water was briefly mentioned, but with no discussion about where additional water is to come from or how it is to be paid for. There are numerous other medium- and high-density developments already underway.

Dated at 10,000 to 24,000 years old, Grande Ronde water is an ancient, pristine, and non-replaceable source of water.

Some conclude that the Grande Ronde aquifer is stabilizing due to more stabilized pumping from that aquifer; however, this false conclusion is due to Moscow's increased pumping from the Wanapum aquifer over the past 13 years. Due to precipitous declines in the Wanapum 4 to 5 decades ago, deep wells were drilled into the Grande Ronde to supply Moscow's water. When all pumping was occurring from the Grande Ronde, the Wanapum was able to recharge. In 1990, Moscow revamped its Wanapum wells and filters and has increased pumping from zero to approximately 275 million gallons this year (about 30% of total Moscow water use). We are now seeing the same declines in Wanapum water levels as we did in the 1950's and 1960's. Clearly when the declining water level line and the increasing population level line on our graph intersect, we are in trouble.

I was impressed at citizen turnout for the 2/2/04 IDWR meeting regarding our local water issues. It was too bad the speakers' canned presentations did not provide nitty-gritty, well-focused information and encourage the open public discussion that had been advertised. However, you, as Director of IDWR, have my high expectation to hold to the highest standards for water resource management for current and future Idaho citizens. Send a strong signal to local bureaucrats that too much time has already gone by. As a conscientious long-time resident of Moscow I want to see us working for a better future than the crisis management model that other states seem to have elevated to an art form.

Thank you for your complete review and consideration of this matter.

Dianne French

Moscow, ID

Mr. Karl Dreher, Director  
Idaho Dept. of Water Resources  
1301 North Orchard St.  
Boise, Idaho 83706

RE: Designation of Moscow Aquifers

Dear Director Dreher:

We appreciate Idaho Dept. of Water Resources informative meeting regarding the aquifers in our area, and would like to thank you for your time, effort and consideration of our comments.

We have attended all of the hearings held by the City in regards to water management in our area as well as the water resources workshop where Mark Soloman acted as spokesperson for Moscow's 'Concerned Citizens' group. Mr. Soloman inferred that the City was working behind the citizens' backs regarding water management decisions, essentially leaving them out of the loop. His inference implies, to us, a knee-jerk reaction to what they perceived to be a behind the scenes management attempt. It is our belief that this 'Concerned Citizens' group is in fact protesting not inefficient management of water resources, but any type of growth within the City.

We urge you to take into account the scientific studies, which appear to indicate that our water resources have stabilized in the last several years, despite our growth. We would encourage and support the implementation of beneficial methods in order to manage our resources such as regulated yard watering; methods that do not harm the vast majority of our citizens.

However, we are adamantly opposed to an imposition of a water moratorium, which is the drive behind the 'Concerned Citizens' protests. Based on the information gathered, we believe that our current water resources do not warrant a designation of Critical Groundwater Area, and we strongly urge you to take into account the accurate factual relevancies in this case.

Again, we appreciate your time and consideration. If we can provide further input on our position, we would be delighted to do so; please don't hesitate to contact us.

Respectfully,  
Shelley L. Bennett, Owner/Broker  
Kathy Weber, Associate Broker  
Cherie Coleman, Sales Associate  
Karyl Davenport, Sales Associate  
Sean M. Wilson, Sales Associate  
Terri Guenther, Sales Associate  
John and Francoise Hauser, Sales Associates

Debbie Loaiza, Associate Broker  
Teri Skiles, Sales Associate  
Patty Gemberling, Sales Associate  
Trevor Young, Sales Associate  
Cindy Agidius, Sales Associate  
Susan R. Wilson, Assistant

Bennett & Associates Real Estate, Moscow, ID 83843

Director IDWR,

I ask you to please add my comments on the Grande Ronde/Wanapum Petition in Moscow, Idaho.

I would support you making the area a Critical Groundwater Management Area for the following reasons..

1. Moscow City Council is completely ignoring the fact that the water level is dropping 1-1/2' to 2' a year.
2. They recently annexed 84 acres to the city of Moscow without having the water issue settled and jeopardizing future water availability to current residents.
3. They really don't know for certain how many gallons of water they are pumping.
4. There is a very good possibility that thousands of gallons of water is leaking in to the ground because of old water mains.
5. They need an in-depth study comparing how many gallons of water they are pumping compared to how many gallons they are billing residents.
6. They continually disregard the wishes of the majority of the people when they ignore the water issue.
7. Last summer when they were approached to take action on dwindling water supplies they enacted "voluntary" watering restrictions which ended up using more water than the previous year.

Dick Schmidt  
Moscow, ID 83843

IDWR  
Boise, ID

SENT VIA EMAIL

Dear IDWR,

I am commenting on the petition for the Grande Ronde aquifer as a Critical Ground Water Management Area and the Wanapum aquifer as a Ground Water Management Area. I strongly support IDWR ruling in favor of this petition.

For 30+ years, the city and other entities have been engaged in delay, study, more delay, and study, all with the excuse something is being done to address groundwater overuse. The charade has not addressed this serious problem.

The groundwater is being mined while rampant growth continues. The rate of decline continues

in spite of assurances that at some future date, that the rate will be slowed. That has not happened and the data presented at the IDWR meeting on February 2 shows that to be the case.

In fact, given the long recharge times for the Grande Ronde aquifer, it is ridiculous to suggest that recharge can even occur. The 8,000 to 10,000 years it takes recharge to occur amounts to actual water mining.

Moscow and U of I need to be put on a water budget. There should be limits placed on well pumping from the Grande Ronde and Wanapum Aquifers by IDWR for these two entities.

Finally, the so-called February 2 public meeting organized by IDWR was a disaster. There was no opportunity for public input for a public meeting. The meeting was a disgrace to our system of government. I felt like we were attending a meeting in the Kremlin circa 1950.

Gary Macfarlane  
Moscow, ID 83843

Nancy Chaney  
1333 Ponderosa Dr.  
Moscow ID 83843

RECEIVED  
JAN 20 2004

Department of Water Resources

Mr. Karl Dreher, Director  
Idaho Dept. of Water Resources  
1301 N. Orchard St.  
Boise ID 83706

Jan. 16, 2004

Dear Director Dreher:

Thank you for the care and interest that you have shown in considering future management of groundwater in the Grand Ronde and Wanapum Aquifers. As you have undoubtedly discerned, we have a wealth of information about our water supply on the Palouse, but lack key knowledge about the volume and sustainability of the Grande Ronde resource, including what effect, if any, conservation measures may have on water supplies and whether a mechanism for natural recharge even exists. We have watched levels in the Grande Ronde decline at a fairly constant rate of 1-2 feet per year since measurements were first taken, something like 100 years ago. We have known for a long time that someone someday would have to make hard choices about managing the resource. As is human nature, we have just hoped that it wouldn't have to be us.

Recently, you received a letter from Moscow's Mayor Comstock in response to a coalition's petition to IDWR for Critical Groundwater Area designation for the Grande Ronde and Groundwater Management Area designation for the Wanapum. In his letter, the Mayor made a number of references to the City's position and the perspective of the City Council, but it is worthy of note that he refers to the previous political body. Three of us—half of the Council—are new as of January 5. *As a new member of the City Council, I want you to know that the opinions herein are my own and that I do not purport to speak for the City, any more than the City's previous letter speaks for me.* I hope that the newly-elected City Council also considers more restrictive water-use standards, a tiered rate structure, incentives for xeriscaping, rainwater catchment systems, possibly gray water re-use systems, printed feedback to consumers about their relative consumption, water-saving appliances, and more. We may be able to accomplish as much through local control as could be accomplished with IDWR intervention, but perhaps not, and an adequate supply of clean water is too important to jeopardize.

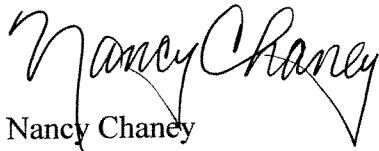
The political climate has shifted, but political, economic, and other self interests can be tempting, even when good, well-intentioned people are involved. In fairness to future generations, broader ecosystems, downstream users, and senior water rights holders, we must set aside money, build infrastructure, educate the public, solicit funding, and look at a variety of possible solutions, instead of seeming determined to put short term gratification ahead of long-term multi-generational well-being and perceived urgency to proceed with artificial injection. For those reasons and because for now, pumping less from one aquifer means pumping more from the other, I think that it would be reasonable for IDWR to designate both the Grande Ronde and the Wanapum as GWMA's. Justification for petitioning for the more restrictive designation of

Critical relates to the stipulation that doing so requires a public hearing (which you offered anyway) and makes the topic front page news and the subject of numerous forums as it should be. An additional incentive that you suggested in your remarks of Nov. 24 is that any formal designation by IDWR could improve the likelihood of obtaining additional funding for water management efforts in and around Moscow.

As an alumna (M.S. Environmental Science '02), I applaud the University of Idaho's use of treated effluent on its golf course and play fields. Many of us are proud of the multijurisdictional concept behind Palouse Basin Aquifer Committee (PBAC) and the work that it does. Still, we can work more diligently and cooperatively with our neighbors. Competition based on economic development must not usurp science as the basis for watershed management planning. I was pleased to hear your comments about including PBAC representation in any advisory committee that you might require. Ideally, that committee would include PBAC members from both sides of the border working together to develop a viable bi-state water management plan for the near and distant future. I am encouraged to learn about watershed planning based on WRIA 34 and an ongoing study by Golder Associates, Inc. funded by Washington's Department of Ecology. That they plan to include recommendations for revising laws pertaining to management of water resources and that the project involves both surface and groundwater is particularly encouraging. I am pleased that Moscow has been considered in those efforts.

Thank you for soliciting wide-ranging input on this important matter. No one knows if or when our situation will become critical. We can only hope to be ready for that eventuality by planning for it now. Your designation of GWMA and/or CGWA would provide a sturdy framework for decision-making by this and future City Councils. If you choose to allow continued local oversight, but recommend more aggressive efforts, I request that you attach an "or else" clause with a relatively short timeline of 12-18 months, to encourage energetic action in conservation and other water management planning.

Respectfully,

A handwritten signature in black ink that reads "Nancy Chaney". The signature is written in a cursive, flowing style.

Nancy Chaney

ECC: Moscow City Council  
Mayor Marshall Comstock  
Gary Riedner, City Supervisor  
Les MacDonald, Public Works Director

Feb 5, 2004

RECEIVED

Department of Water Resources

To Whom it MAY Concern FEB 5 2004

I've been reading the LOCAL Planet  
And found The Eco-Update About The  
Aquifer, it doesn't take A genius, Their is  
No way you CAN Conserve Water, when you  
Build THOUSANDS of Homes, which HAVE  
To be hooked up To The Water Systems  
IN Stead, you have To Control How many  
Homes That CAN be built, Maybe one  
home ON ONE Acre, it doesn't MATTER IF  
it's Idaho OR Washington, There's No Control,  
All of The LAKES, AND Rivers Are polluted.  
It's Ashame what They have done To Idaho  
AND Washington just because of greed.

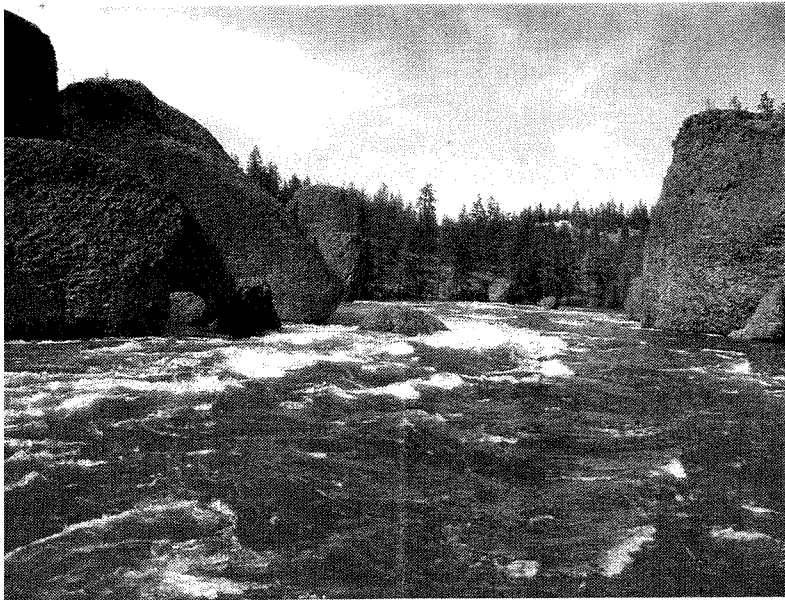
Control of population is control of how  
much water is being used. They ARE  
trying to MAKE This ANother California, AND  
They ARE doing A pretty good job of it.

Because They ARE getting All of The  
problems, California has, with over  
population

Concerned Citizen

Scott Veillette  
N. 511 Corbin Rd.  
Greenacres, WA,  
99016





# Eco-Update

Protecting Public Health and the Environment  
compiled by John Osborn

Citizen volunteerism is essential to our Inland Northwest community. Public vigilance and oversight is the price we pay to protect public health, the environment, and our children's future.

The Inland Northwest faces some of the most daunting environmental challenges the nation, perhaps anywhere on earth. These include the cleanup of the Hanford nuclear Reservation and the Superfund cleanups of the Spokane River/Lake Coeur d'Alene Basin and Lake Roosevelt. We must so protect our local forests and waters.

We have opportunities to positively influence the work of public agencies. Taking a few moments to write a letter, or a few hours to speak at a public hearing can make a difference.

## National Forests: Wenatchee-Okanogan-Colville

Most of you spend time in the forests of north central and northeastern Washington. The U.S. Forest Service is writing federal plans for these millions of acres of public forest. Mark Rey, former timber corporate lobbyist and now President Bush's political appointee, controls the Forest Service. Careful citizen oversight of this federal agency is absolutely critical.

Please write a quick letter to the Forest Service. Ask the agency to address the numerous changes that have taken place since the Wenatchee-Okanogan-Colville Forest Plans were first published in the 1980s, including a significant increase in off-road vehicle (ORV) use and damage, a continuing loss of roadless areas, and excessive loss of wildlife habitat from an oversized logging road system.

Also, please ask the Forest Service to help protect what remains of eastern Washington's wild country by recommending additions to the Wilderness System.

Send your letter to: Rick Brazell, Forest Supervisor, Colville National Forest, 765 South Main Street, Colville, WA 99114. Dead-

line: January 31<sup>st</sup>.

For more information on this topic, contact Rein Atteman of The Lands Council at 509-838-4912 or by e-mail at [ratteman@landscouncil.org](mailto:ratteman@landscouncil.org) or Hal Rowe of the Kettle Range Conservation Group and Sierra Club at 509-747-1663.

## Aquifers:

Water shortages are a looming global and regional threat.

Aquifer levels are dropping at the rate of one to two feet per year in the Moscow-Pullman area. Concerned citizens have petitioned the Idaho Department of Water Resources (IDWR) to designate the Grande Ronde Aquifer as a "Critical Groundwater Area" and the Wanapum Aquifer as a Groundwater Management Area.

The coalition's petition and Moscow's response is at IDWR's website: at [www.idwr.state.id.us/Moscow/default.htm](http://www.idwr.state.id.us/Moscow/default.htm). Please ask IDWR to promote responsible water management. Some points to make are:

### City shirking responsibility.

Although Moscow knew it had a dropping aquifer for 30 years, no real action was taken until citizens petitioned IDWR for help.

▪ **Need a water budget.** City efforts to conserve water have been negligible. Water consumption in Moscow rose 5% in 2003 compared to 2002. Moscow needs to be put on a water budget.

▪ **Need for real water conservation.** IDWR should create a local advisory board that includes water conservation advocates. Given the serious threat to Moscow's water, the community's future requires strong institutional advocacy for water conservation.

Send your comments to: IDWR, 1301 N. Orchard Street, Boise, ID 83706; fax: 208-327-7866; or email [IDWRInfo@idwr.state.id.us](mailto:IDWRInfo@idwr.state.id.us). The deadline for comments is at the end of February. For more information contact Dianne French (Palouse Water Conservation Network) at [dfrench@moscow.com](mailto:dfrench@moscow.com).

Karl

1300 NW Orion Drive  
Pullman, WA 99163  
February 23, 2004

Mr. Karl Dreher, Director  
Idaho Department of Water Resources  
1301 North Orchard Street  
Boise, ID 83706

RE: Palouse Basin Aquifer

Dear Mr. Dreher:

My purpose in writing is to urge that the Palouse Basin Aquifer **not** be designated as either a "Critical Ground Water Management Area" or a "Ground Water Management Area."

I am a mechanical engineer and attorney, and a member of the Pullman City Council. I am also Pullman's council appointee to the Palouse Basin Aquifer Committee (PBAC).

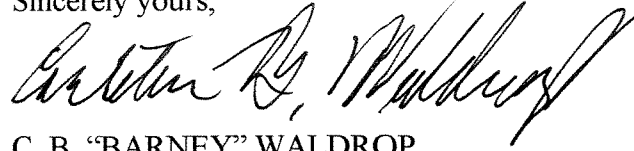
Even before my appointment to PBAC I had been privileged to hear several public presentations by PBAC members concerning the aquifer. I was also in attendance at the Idaho Department of Water Resources (IDWR) presentation on February 2, 2004, and Dr. John Bush's detailed presentation on January 15<sup>th</sup> at the University of Idaho regarding the complex nature of the Palouse Basin's subsurface geology.

PBAC is a superb example of interagency cooperation across state boundaries. Funding by PBAC's membership supports aquifer research such as that undertaken by Dr. Bush and his graduate assistants, and other respected scientists from both the University of Idaho and Washington State University. Realistic goals have been established by PBAC that are aimed at preserving the Grande Ronde and Wanapum aquifer systems. Month by month more knowledge and understanding of the geology and hydrogeology of these two vital resources is being collected. It would be premature to attempt to draw definite conclusions at this time.

There is no question, however, that expanded monitoring and continued research are critically important. The Washington State Department of Ecology's test well has provided unique and valuable information. However, additional funding is needed to perhaps case off certain depths of this well to allow more finite monitoring. Expanded monitoring in the basin is also required, as is the standardization of all monitoring equipment and records. These are cost items that are being addressed as permitted by PBAC resources. Additional state level funding by Washington and Idaho could measurably accelerate PBAC's research initiatives.

Thank you for your consideration of my request regarding the ground water management designation issue. In my opinion such a designation could jeopardize the ongoing science and the established governmental cooperative efforts related to the aquifer.

Sincerely yours,

A handwritten signature in black ink, appearing to read "C. B. 'Barney' Waldrop". The signature is fluid and cursive, with a long, sweeping line extending from the end of the name towards the upper right corner of the page.

C. B. "BARNEY" WALDROP  
Pullman City Council, Ward 2

Attorney at Law

Cc: Washington State Department of Ecology